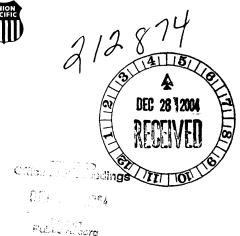


December 27, 2004

Via Facsimile to 202/565-9004 and UPS Next Day Air

The Honorable Vernon A. Williams Secretary Surface Transportation Board 1925 K Street, N.W. Washington, D.C. 20423-0001



Re: STB Ex Parte No. 558 (Sub-No. 8), Railroad Cost of Capital - 2004

Dear Secretary Williams:

Union Pacific Railroad Company intends to participate in the above-captioned proceeding by filing comments in conjunction with the Association of American Railroads and other Class I railroads.

Service of any comments filed by other parties should be sent directly to Union Pacific Railroad Company, addressed as follows:

> J. Michael Hemmer Louise A. Rinn Union Pacific Railroad Company Law Department 1400 Douglas Street, MAIL STOP 1580 Omaha, NE 68179-1580

Very truly yours,

CC:

Louis P. Warchot, Esq. Dennis J. Starks, Esq.

Association of American Railroads

Louise Anne Rinn Associate General Counsel

UNION PACIFIC RAILROAD 1400 Douglas St., Stop 1580, Omaha, NE 68179-1580 ph. (402) 544-3309 fx. (402) 501-0129 larinn@up.com